Presentment Date: April 15, 2011 at 10:00 a.m. Objection Deadline: April 8, 2011 at 4:00 p.m.

## **BROWN RUDNICK LLP**

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Attorneys for the Foreign Representatives

## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re:	)
	) Chapter 15 Case
FAIRFIELD SENTRY LIMITED, et al.,	)
,,	) Case No: 10-13164 (BRL)
Debtors in Foreign Proceedings.	)
	) Jointly Administered
	_ ()
FAIRFIELD SENTRY LTD. (IN LIQUIDATION), et al.,	) 
771 1 4100	) Adv. Pro. No. 10-03496
Plaintiffs,	)
-against-	)
	) Administratively
THEODOOR GGC AMSTERDAM, et al.,	) Consolidated
	)
Defendants.	)
	_ )
This document applies to the adversary proceedings listed	)
in Exhibit A to the Motion.	_ )

## NOTICE OF PRESENTMENT OF PROPOSED ORDER GRANTING THE FOREIGN REPRESENTATIVES' MOTION FOR LEAVE TO AMEND COMPLAINTS IN REDEEMER ACTIONS

**PLEASE TAKE NOTICE** that Kenneth Krys and Joanna Lau (together with their predecessors, the "Foreign Representatives"), in their capacities as Foreign Representatives and court-appointed Liquidators of Fairfield Sentry Limited (In Liquidation) ("Sentry"), Fairfield Sigma Limited (In Liquidation) ("Sigma") and Fairfield Lambda Limited (In Liquidation) ("Lambda" and, together with Sentry and Sigma, the "Funds"), through their United States

counsel Brown Rudnick LLP, will present to the Honorable Burton R. Lifland for signature on April 15, 2011 at 10:00 a.m. a proposed order (the "Order") in the above-captioned Chapter 15 cases and administratively consolidated adversary proceedings granting the relief sought by the Foreign Representatives' Motion for Leave to Amend Complaints in Certain Redeemer Actions (the "Motion").

PLEASE TAKE FURTHER NOTICE that any response or objection to the Order must be filed with the Bankruptcy Court and served upon: (i) the Chambers of the Honorable Burton R. Lifland, One Bowling Green, New York, New York 10004 (the "Bankruptcy Court") and (ii) Brown Rudnick LLP, 7 Times Square, New York, New York 10036 on or before April 8, 2011 at 4:00 p.m. (the "Objection Deadline").

**PLEASE TAKE FURTHER NOTICE** that if an objection to the proposed order is not received by the Objection Deadline, the relief requested shall be deemed unopposed, and the Bankruptcy Court may enter an order granting the relief sought without a hearing.

**PLEASE TAKE FURTHER NOTICE** that if an objection to the proposed order is filed, a hearing may be held before the Honorable Burton R. Lifland, United States Bankruptcy Judge, at a date to be scheduled by the Court, upon such additional notice as the Court may direct. The moving and objecting parties are required to attend the hearing, and failure to attend in person or by counsel may result in relief being granted or denied upon default.

Dated: New York, New York April 1, 2011

Respectfully submitted,

## **BROWN RUDNICK LLP**

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